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8 Attorney for Defendants PERFECT 10, INC.  
9 and NORMAN ZADA  
10

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA

13 GIGANEWS, INC., a Texas corporation;  
14 LIVEWIRE SERVICES, INC., a Nevada  
15 corporation,

16 Plaintiffs,

17 v.

18 PERFECT 10, INC., a California  
19 corporation, NORMAN ZADA, an  
20 individual, and DOES 1-50, inclusive

21 Defendants.  
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Case No.: 2:17-cv-05075-AB (JPR)

**DISCOVERY MATTER**

*Before Hon. Jean P. Rosenbluth*

**DEFENDANTS' SUPPLEMENTAL  
MEMORANDUM RE JOINT  
STIPULATION; DECLARATION OF  
DR. NORMA ZADA IN SUPPORT  
THEREOF**

Date: July 19, 2018

Time: 10:00 a.m.

Courtroom: 690

1 Local Rule 37-2.3 provides that “[a]fter the Joint Stipulation is filed, each  
2 party may file a supplemental memorandum of law.” Defendants’ purported  
3 “Supplemental Memorandum of Law”, filed on July 9, 2018, did not argue the law,  
4 but instead provided a host of factual assertions, supported by a Declaration (with  
5 exhibits) from Plaintiffs’ attorney. Accordingly, it is proper and necessary for  
6 Defendants to submit their own facts rebutting the incorrect and false assertions  
7 made in Plaintiffs’ Supplemental Memorandum. To that end, Defendants herein  
8 submit the concurrently-filed Declaration of Dr. Norman Zada and the exhibits  
9 attached thereto.

10 DATED: July 10, 2018

LAW OFFICES OF MATTHEW C. MICKELSON

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12 By: /s/ Matthew C. Mickelson

13 MATTHEW C. MICKELSON  
14 Attorney for Defendants Perfect 10, Inc.  
15 and NORMAN ZADA  
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